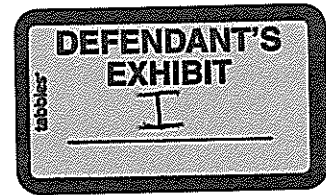


Barbara Brown

10/11/2006

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UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

-----X

IAN BROWN, JAMES BROWN and
BARBARA BROWN,

Plaintiffs,

-against- Civil Action
No. 04civ1192-RGS

UNITED STATES OF AMERICA, VERIZON
NEW ENGLAND, INC., and BOSTON
EDISON COMPANY d/b/a NSTAR ELECTRIC,

Defendants.

-----X

October 11, 2006
9:48 a.m.

Deposition of BARBARA BROWN, taken by the
Defendants, pursuant to notice, held at
Manheimer & Charnas LLP, 747 Third Avenue,
New York, New York, before Tracy Eckhoff, a
Shorthand Reporter and Notary Public within and
for the State of New York.

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BARBARA BROWN

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2 **Q. Or his utility bills or insurance?**

3 **A. No.**

4 **Q. So before his accident, you didn't**
5 **provide any financial support to Ian?**

6 **A. No.**

7 **Q. Now, after the accident -- I'm sure**
8 **the accident had -- well, changed your**
9 **relationship with Ian to some extent. And can you**
10 **just talk a little bit about how the relationship**
11 **changed after the accident.**

12 **A. Upon Ian's injury, my role had been**
13 **mom. From the date of his injury throughout the**
14 **next half year or more, I became caregiver,**
15 **cheerleader, punching bag, family litigator, roles**
16 **I never envisioned for myself, but Ian helped me**
17 **become a better, stronger version of myself.**

18 **Q. Do you think the accident brought you**
19 **and Ian closer together?**

20 **A. I do.**

21 **Q. We sat with Ian for almost two days,**
22 **and he's like one of the most positive people I've**
23 **ever seen. We deposed Ms. Gagne and we learned a**
24 **little bit more about Ian and who he is. I'm**
25 **wondering if you'd talk a little bit about a side**

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Okay.

And he's really fine, but those are the physical types of assistance that I'm able to give him.

Q. Do you consider Ian to be emotionally dependent on you?

A. No.

Q. Now, I believe that -- do you know how much Ian receives from the federal government every month?

A. I do not.

Q. Do you know how much approximately he receives?

A. I do not.

Q. Does Ian contribute to the household expenses?

A. He does.

Q. In what way does he contribute to the household expenses?

A. He contributes towards a budget-planned electrical bill, budget-planned gas bill, and he purchases the food at the commissary for us, for the household.

Q. Does he pay the entire gas and

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BARBARA BROWN

1
2 **electric bill?**

3 A. He does.

4 **Q. And he pays for all the food?**

5 A. He does. He pays for the majority of
6 the food.

7 **Q. Do you give Ian an allowance of any**
8 **sort?**

9 A. No.

10 **Q. Do you pay for Ian's school?**

11 A. Excuse me?

12 **Q. Do you pay for his school? I'm**
13 **sorry.**

14 A. No.

15 **Q. How about Ian's clothing?**

16 A. Gifts occasionally, you know. He's a
17 clothes horse.

18 **Q. But he generally buys his own**
19 **clothes?**

20 A. He does. He does.

21 **Q. So Ian is not financially dependent**
22 **on you?**

23 A. No.

24 **Q. Do you know if Ian has been exploring**
25 **living on his own?**

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BARBARA BROWN

A. I'm sorry, Josh. Again.

Q. Sorry.

Do you know if Ian has been exploring
living on his own outside of your house?

A. I do not know.

Q. Did you receive any money -- or did
Ian contribute any money for the modifications you
made to your home?

A. No.

Q. Are you aware that Ian at one point
in his lifetime will have provided to him by the
federal government the expense necessary to
retrofit a residence for him?

A. The question again, Josh. I'm sorry.

Q. It was terrible.

A. No. No.

Q. Are you aware that the federal
government will provide to Ian the expenses
necessary to retrofit a residence for him?

A. For Ian?

Q. Yes.

A. I believe so.

Q. Do you know if Ian has any plans to
take advantage of that?